# FILED U.S. DISTRICT COURT FERN DISTRICT OF TEXAS

# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS BEAUMONT DIVISION

MAR - 1 2021

UNITED STATES OF AMERICA	§ 8	DEPUTY DEP
v.	\$ \$ 8	No. 1:20cr79 (2)
RHONDA MONSCHELLE FELDER (2)	§ §	

## **FACTUAL BASIS**

The government presents to the Court, by and through the undersigned Assistant
United States Attorney in and for the Eastern District of Texas, joined by the defendant
Rhonda Monschelle Felder, and the defendant's attorney Brian Roberts, and presents
this factual basis and stipulation in support of the defendant's plea of guilty to Count One
of the Indictment and in support thereof, would show the following:

- 1. That the defendant **Rhonda Monschelle Felder**, hereby stipulates and agrees to the truth of all matters set forth in this factual basis and stipulation, and agrees that such admission may be used by the Court in support of her plea of guilty to Count One of the Indictment, alleging a violation of 21 U.S.C. § 846, Conspiracy to Possess with Intent to Distribute a Detectable Amount of Methamphetamine, a Schedule II Controlled Substance.
- 2. That the defendant, **Rhonda Monschelle Felder**, who is pleading guilty to such Indictment, is one and the same person charged in the Indictment.

- 3. That the events described in the Indictment occurred in the Eastern District of Texas.
- 4. That had this matter proceeded to trial, the government, through the testimony of witnesses, including expert witnesses, and through admissible exhibits, would have proven, beyond a reasonable doubt, each and every essential element of the offense alleged in the Indictment; specifically, the government would have proven:

Beginning in 2018, the Drug and Enforcement Administration (DEA), the Bureau of Alcohol Tobacco, Firearms, and Explosives (ATF) and the Jasper Police Department (JPD) began an investigation into the Limbrick Drug Trafficking Organization (Limbrick DTO), operating out of Jasper, Texas, which is in the Eastern District of Texas.

On September 5, 2019, a deputy with the Liberty County Sheriff's office noticed the driver of a red Toyota Corolla not wearing a seatbelt, in Liberty County, Texas which is in the Eastern District of Texas. As the deputy made contact with the occupants of the vehicle, the deputy immediately noticed the smell of burnt marijuana. The driver of the vehicle was identified as Johnathan Limbrick, and the passenger as **Rhonda Monschelle Felder (Felder)**. Limbrick admitted to smoking marijuana in the vehicle. During a subsequent search of the vehicle officers noticed a clear plastic bag bulging out of **Felder's** purse. Officers recovered the bag and noticed it contained roughly two hundred grams of a substance believed to be methamphetamine. In a post-Miranda statement

Limbrick admitted there were approximately six (6) ounces in the bag recovered from Felder's purse and that he (Limbrick) paid \$1,800 for the methamphetamine. Furthermore, the investigation revealed the car Felder and Limbrick were driving was borrowed from a third-party with the intention to drive to Houston, Texas to pick up methamphetamine for distribution in Jasper, Texas. The suspected methamphetamine recovered from Felder's purse was submitted to the DEA's South Central Laboratory and it determined the substance to be d-Methamphetamine Hydrochloride with a purity of 99 percent in the amount of 195.7 grams.

Rhonda Monschelle Felder admits that she agreed with two or more persons, directly or indirectly to possess with the intent to distribute methamphetamine; knowing that the agreement to possess with the intent to distribute methamphetamine was unlawful; and that she joined the agreement willfully, intending to further the possession with intent to distribute methamphetamine. That the defendant knew or reasonably should have known the scope of the conspiracy involved at least one hundred and ninety five (195) grams of d-Methamphetamine Hydrochloride with a purity of 99 percent in the amount of 195.7 grams.

**Felder's** role in the conspiracy is limited to the one hundred and ninety five grams of d-methamphetamine discussed above.

#### DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT

5. I have read this factual basis and stipulation and the Indictment or have had them read to me and have discussed them with my attorney. I fully understand the contents of this factual basis and stipulation and agree without reservation that it accurately describes the events and my acts.

Dated: 3/1/2021

Rhonda Monschelle Felder

Defendant

### DEFENSE COUNSEL'S SIGNATURE AND ACKNOWLEDGMENT

6. I have read this factual basis and stipulation and the Indictment and have reviewed them with my client, **Rhonda Monschelle Felder**. Based upon my discussions with the defendant, I am satisfied that the defendant understands the factual basis and stipulation as well as the Indictment and is knowingly and voluntarily agreeing to these stipulated facts.

Dated: 3/1/2021

Brian Roberts

Attorney for the Defendant

Respectfully submitted,

NICHOLAS GANJEI

ACTING UNITED STATES ATTORNEY

Russell James

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